

# Exhibit 14

1 I, Joan Miller, declare as follows:

2 1. I am a resident of the State of California. I have personal knowledge of the facts set  
3 forth in this declaration and, if called as a witness, could and would testify competently to the matters  
4 set forth below.

5 2. I am the Deputy Director of the City and County of San Francisco (“City”) Human  
6 Services Agency (HSA) Family and Children’s Services Department. Before joining HSA, I was  
7 Director of Family and Children’s Services for the County of Santa Cruz. Prior to that, I worked for  
8 Contra Costa County for 17 years as a protective service worker, a unit supervisor, a program  
9 manager, and the Child and Family Services Director.

10 3. I understand that the Department of Health and Human Services’ new interpretation of  
11 “federal public benefit” within the meaning of the Personal Responsibility and Work Opportunity  
12 Reconciliation Act of 1996 (PRWORA) includes Title IV-E Prevention Services Funds.

13 4. HSA receives these funds from HHS (via the California Department of Social Services)  
14 and uses them to plan for prevention services and in the future intend to use the funds to provide  
15 referrals and services to children and families that are candidates for foster care, but whereout of home  
16 placement can potentially be avoided with appropriate preventive services. Among the evidence-  
17 based services that will likely be supported with these funds are parent training programs and  
18 counseling.

19 5. We do not ask service recipients about their immigration status before offering these  
20 services. If we were required to do so, I believe that people would be reluctant to reach out to access  
21 needed services or to report others who might benefit from such services. In some of these families  
22 who never come to our attention—and in some families that would be ineligible for services due to  
23 their immigration status—the situation will escalate to the point where children could be subjected to  
24 abuse or neglect and require intervention by the child welfare agency. In addition to the obvious and  
25 impact this will have on children, it will also put an additional burden on the City and on HSA if we  
26 are required to involve law enforcement, remove the child from the parents care, and take on legal and  
27 financial responsibility for the child.  
28

1           6.       To the extent that the new order issued by the Department of Justice withdrawing the  
2 Attorney General's January 5, 2001 order issued pursuant to PRWORA also prohibits us from  
3 providing additional "services and assistance relating to child protection . . . [and] violence and abuse  
4 protection" without first verifying a child or parent's immigration status, these negative  
5 consequences—including harm to children and increased burden on the City—will be significantly  
6 intensified.

7           7.       I understand that the Department of Health and Human Services' new interpretation of  
8 "federal public benefit" also includes Title IV-E Kinship Guardianship Assistance Program funds.

9           8.       HSA receives these funds from HHS (via the California Department of Social Services)  
10 and uses them to provide support to the relative guardians of children in long-term placement with  
11 relatives. This program is intended to enhance family preservation and stability by providing relatives  
12 with an alternative route to permanency when reunification and adoption are not appropriate  
13 permanency options. If these benefits become subject to immigration verifications, more children will  
14 enter into, and languish, in foster care. This will be bad for children and bad for SF, which will have  
15 responsibility to care for the child.

16           I declare under penalty of perjury that the foregoing is true and correct and that this declaration  
17 was executed on July 18, 2025 at San Francisco, California.



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Joan Miller